

1 Q. What do you consider the essential attributes or
2 characteristics or qualities that a teacher who aspires to
3 be a role model should have?

4 A. Basically somebody who has all the
5 characteristics, all the positive characteristics that
6 students would look up to.

7 Q. To look up to?

8 A. Yeah.

9 Q. To be specific, in terms of numeration of them,
10 what would you say in terms of one through five in
11 qualities?

12 A. I would say, number one, I think it has to be
13 someone that's genuine. Someone that is respectful.
14 Someone who has interest, caring and kind. That's five, I
15 believe. Not necessarily in that order but they are all
16 close.

17 Q. Um-hmm. That kind of person you would like to
18 interview, wouldn't you, for a job, wouldn't you? Wouldn't
19 you like to attract that style of person at Crawford Central
20 School District as a teacher?

21 A. Yes.

22 Q. Those qualities that you just specified you
23 wouldn't say -- would you say -- if I were to ask you and
24 reflected on Mrs. Wagner, you have seen her application many
25 times, her background, is she without any of those



1 qualities?

2 A. She has --

3 Q. Is she without any of those qualities?

4 A. Is she without any of those qualities?

5 Q. Um-hmm.

6 A. No.

7 Q. So logically speaking, why hasn't she been
8 extended the courtesy of interviews since 2004?

9 A. To my knowledge Mrs. Wagner has not made any
10 attempt to take advantage of the suggestions that we have
11 offered her on two separate occasions actually.

12 Q. Well, she has continued to submit letters, which I
13 just showed you, indicating her interest in positions,
14 right?

15 A. Yeah.

16 Q. And this has -- she had been persistent in
17 submitting these applications at least four years now; is
18 that correct?

19 A. Yes, that's correct.

20 Q. Okay.

21 (Discussion held off the record.)

22 MR. NICHOLS: All right. Mr. Heller, I don't have
23 anymore questions myself. I thank you for coming.

24 THE WITNESS: Thank you.

25 MR. NICHOLS: It's approximately 10:30.